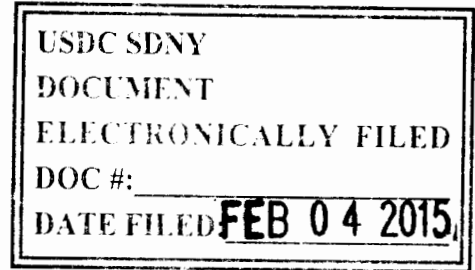


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February 3, 2015

Via ECF

Honorable Katherine B. Forrest
United States District Judge
United States Courthouse
500 Pearl Street, Room 1950
New York, NY 10007



Re: Grand Manor v Koskinen, Docket No. 14 cv 10130 (KBF)

Dear Judge Forrest:

I represent the defendants, Hamilton Equities Co., Hamilton Equities Inc., Robert J. Nova and Suzan Chait-Grandt in the within action. I write to request an immediate conference on an urgent basis to resolve an issue that has just arisen and cannot wait until the next scheduled court date of March 2, 2015.

The Lease (Exhibit "1" to the Complaint) at Article XI permits access to the premises for the purpose of showing the premises to prospective buyers. My clients are in the process of selling this building. They have, in the past, shown the building to prospective purchasers, arranging for inspections at a mutually convenient time for the tenant, Plaintiff herein. However, the reason I request a conference is that my adversary, Mr. Breitenbach, now advises that access to the building will be denied, unless his clients are provided with a copy of the contract of sale, along with other patently unreasonable conditions.

I attempted to resolve this with my adversary to no avail. I attach copies of relevant correspondence between us. While I do understand the need for aggressive advocacy, I believe that my adversary has crossed a line by maintaining this patently unreasonable position and I respectfully ask for the Court to intercede so that we can show the building to prospective purchasers who have expressed an interest on terms that would be acceptable to my clients.

Obviously, the sale of the building would help in the resolution of all the matters before this court and would be of benefit not only to my clients but to Berkadia and, perhaps, the IRS as well.

Based upon the foregoing, I respectfully a conference to discuss possible resolution of this issue, or in the alternative, to serve as a pre-motion conference prior to moving for this relief.

Respectfully,

/s/ John J. Macron

John J. Macron

Enclosures (4)

1. Email Chain 1/28/15 to 1/29/15
2. Email Chain 1/28/15 to 1/30/15
3. Letter 1/28/2015 Roy Breitenbach, Esq. to John J. Macron, Esq.
4. Letter 1/29/2015 John J. Macron, Esq. to Roy Breitenbach, Esq.

Cc: Roy Breitenbach, Esq. (via email)
Steven Rand, Esq. (via email)
Natasha L. Waglow, Esq. (via email)

Ordered
Please note: Next conference is
2/18/15 at 1pm. We shall discuss
this issue at that conference.

K B. Joe
USDJ
2/4/15